

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

THE GEO GROUP, Inc.)	
)	
Plaintiff,)	
)	
v.)	Case No. CIV-23-1014 G
)	
HINTON ECONOMIC DEVELOPMENT)	
AUTHORITY, a Public Trust, and)	
THE TOWN OF HINTON, OKLAHOMA,)	
)	
Defendants/Counterclaimants.)	

**DEFENDANTS’ OBJECTIONS TO THE FINAL EXHIBIT LIST
SUBMITTED BY PLAINTIFF**

Pursuant to the Court’s Second Amended Scheduling Order [Doc. No. 18], the following are Defendants and Counterclaimants The Hinton Economic Development Authority and The Town of Hinton, Oklahoma’s (“Defendants”) Objections to the Final Exhibit List submitted by Plaintiff The Geo Group [Doc. No. 19].

No.	Plaintiff’s Description	Defendants’ Objection
1.	Warranty Deed dated December 29, 1999, conveying property from Cornell Corrections of Oklahoma, Inc. to Hinton Economic Development Authority.	
2.	Lease Agreement entered into as of December 31, 1999.	
3.	Intergovernmental and Private Prison Contractor Agreement dated as of March 1, 2000.	
4.	Sublease dated April 18, 2023, between Municipal Corrections Finance, LP and The Oklahoma Department of Corrections.	
5.	Demands for payment from the Defendants to the Plaintiff.	

No.	Plaintiff's Description	Defendants' Objection
6.	Assignment and Assumption of Lease dated August 14, 2001.	
7.	Amendment to Intergovernmental and Private Prison Contractor Agreement.	Relevance, FRE 401 & 403; Compromise Offers & Negotiations, FRE 408; Hearsay, FRE 802.
8.	Second Amended and Restated Amendment to Intergovernmental and Private Prison Contractor Agreement.	Relevance, FRE 401 & 403; Compromise Offers & Negotiations, FRE 408; Hearsay, FRE 802.
9.	Defendants' Response to Plaintiff's First Set of Discovery Requests.	Relevance, FRE 401 & 403; FRE 408; Hearsay, FRE 802.
10.	All exhibits listed by Defendant not otherwise objected to by Plaintiff.	
11.	All exhibits attached to depositions or produced through discovery and/or subpoenas not otherwise objected to by Plaintiff.	Designation is not specific; exhibits to be offered are unknown at this time and are especially objectionable to the extent that Plaintiff attaches, produces, or subpoenas them; Relevance, FRE 401 & 403; Hearsay, FRE 802; Authentication, Identification of Evidence, FRE 901; Admissibility, Authentication FRE 1001-1004.

Respectfully submitted,

s/Andrew W. Lester

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**ATTORNEYS FOR DEFENDANTS AND
COUNTERCLAIMANTS THE HINTON
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AUTHORITY and THE TOWN OF
HINTON, OKLAHOMA**

CERTIFICATE OF SERVICE

I hereby certify that on August 20, 2024, I electronically transmitted the attached documents to the Clerk of Court using the ECF system for filing and transmittal of Notice of Electronic Filing to all counsel of record including:

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s/Andrew W. Lester